

**Ex. MM**

SHELLEY ANN VERDEGO  
JOE HOLCOMBE vs UNITED STATES

December 17, 2019

1

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE WESTERN DISTRICT OF TEXAS

3 SAN ANTONIO DIVISION

4  
5  
6 JOE HOLCOMBE, et al. ) NO. 5:18-CV-00555-XR

7 Plaintiffs ) (Consolidated cases)

8 -vs- )

9 UNITED STATES OF )

10 AMERICA )

11 Defendant )

12  
13  
14 Videotaped Deposition of Shelley Ann Verdego

15 Arlington, VA

16 Tuesday, December 17, 2019

17 10:00 a.m.

18  
19 Job No: J4766138

20 Pages: 1-195

21 Reported by: Kenneth Norris

1 Any other reason why the DOD was not  
2 providing the FBI NICS system information in DIBRS  
3 concerning these prohibited categories of individual?

4 A. So the FBI has gone on record by saying that  
5 if you have information regarding the 10 prohibitors,  
6 they would prefer they be entered into Triple I, which  
7 is the inter -- I'm going to get this wrong. The  
8 Interstate Identification Index, Triple I, or the  
9 National Crime Information Center; NCIC, before it  
10 goes into the NICS indices. So the Department of  
11 Defense was entering it that way.

12 DIBRS was set up just for statistical data.  
13 And as you can see, the information that was requested  
14 in this MOU was not statistical data.

15 Q. Sure. But let me be -- let me make sure I  
16 understand what you're saying.

17 Does DIBRS contain, for example, the  
18 originating Agency identifier of individuals within  
19 DIBRS?

20 A. It's not -- that identifies the Agency that  
21 -- so in the case of, Air Force OSI, there was like a  
22 nine-digit number.